

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

HARRISON COMPANY LLC,

Plaintiff,

v.

A-Z WHOLESALERS INC. and
BARKAT G. ALI,

Defendants.

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CIVIL ACTION NO. 3:19-CV-1057-B

AGREED MOTION FOR LEAVE TO EXTEND DEADLINES AND MODIFY
SCHEDULING ORDER

Plaintiff Harrison Company LLC (“Plaintiff”), and Defendants A-Z Wholesalers Inc. and Barkat G. Ali (collectively, “Defendants”), file this Agreed Motion for Leave to Extend Deadlines and Modify Scheduling Order (Doc. 9), pursuant to this Court’s Specific Requirement I.E, and state:

1. To accommodate and adapt to the limitations resulting from the COVID-19 pandemic, the parties agree, and respectfully move the Court, to amend certain deadlines in this case as follows:

a. **Completion of Discovery:** By **July 17, 2020**, all discovery shall be completed;

b. **Dispositive Motions:** By **August 14, 2020**, all motions that would dispose of all or any part of this case (including motion for **summary judgment**) shall be filed; and

c. **Pretrial Disclosures and Objections:** Unless otherwise directed by order, the parties must make the disclosures required by Rule 26(a)(3)(A)(i)-(iii) by **August 21, 2020**. Within 7 days thereafter (**August 28, 2020**), a party must serve and file a list disclosing any objections, together with the supporting grounds, to: (1) the use under Rule 32(a) of a deposition designated by another party under Rule 26(a)(3)(A)(iii); and (3) the use of any witnesses (except for expert objections) identified under Rule 26(a)(3)(A)(i),¹ if any. Objections not so disclosed, other than objections under Rule 402 and 403 of the Federal Rules of Evidence, are waived unless excused by the Court for good cause. Responses to objections, if any, should be filed within 7 days of the date of the filing of the objections (**September 4, 2020**).

2. These extensions are necessary because of the delays caused by COVID-19. With attorneys and their clients working remotely, document productions are taking additional time. Also, depositions must be rescheduled, and witness availability is uncertain. Although additional extensions may be necessary if the current situation persists, none of these requested extensions will affect the Court's current pretrial or trial settings.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter an Order extending the above deadlines in the Scheduling Order (Doc. 9), consistent with this Motion.

¹ Requiring parties to file objections to witnesses disclosed under Rule 26(a)(3)(A)(i) is a modification of the requirements of Rule 26(a)(3)(B), which requires only that the parties file objections to deposition designations and exhibits.

Respectfully submitted,

/s/ Joseph A. Unis, Jr.

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CERTIFICATE OF SERVICE

I certify that on April 29, 2020, I served this document on all counsel of record via the ECF system and/or email.

/s/ Anna K. Finger

Counsel for Plaintiff